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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

AMERICAN PROTECTION INSURANCE)	Case No. 08-cv-0662-JM-POR
COMPANY,)	
)	JOINT MOTION FOR EXTENSION OF
Plaintiff,)	TIME FOR DEFENDANT OTAY
)	WATER DISTRICT TO FILE
v.)	RESPONSIVE PLEADING TO
)	AMERICAN PROTECTION
OTAY WATER DISTRICT)	INSURANCE COMPANY'S
)	COMPLAINT
Defendant)	
)	Action Filed: 4/11/08

This Joint Motion to Extend the Time for Defendant Otay Water District ("Otay Water") to Answer or Otherwise File Its Responsive Pleading to the Complaint Filed by Plaintiff American Protection Insurance Company ("American Protection") is filed pursuant to the United States District Court Southern District of California's Local Civil Rules 7.2 and 12.1. By this Joint Motion, the parties Defendant Otay Water and Plaintiff American Protection, through their counsel, stipulate and agree that:

1 1. Plaintiff American Protection filed its Complaint for Declaratory Judgment in this
2 action on April 11, 2008;

3 2. Plaintiff American Protection served its Complaint on Otay Water by mail with a
4 Notice of Lawsuit and Request for Waiver of Service of Summons;

5 3. Defendant Otay Water signed and returned the Waiver of Service of Summons on
6 April 22, 2008, by which the due date for filing its Answer or otherwise responding to the
7 Complaint within 60 days is Friday, June 20, 2008;

8 4. Otay Water has only recently retained litigation counsel to represent it in this
9 action; and

10 5. Therefore, good cause exists to grant Otay Water an extension of approximately
11 two weeks until July 7, 2008 to file and serve its response to American Protection's Complaint.

12 Accordingly, by this Joint Motion, the parties Defendant Otay Water and Plaintiff
13 American Protection, through their counsel, further stipulate, agree, and jointly move this Court
14 for an order as follows:

15 1. Granting Defendant Otay Water District an extension of time until July 7, 2008 to
16 file its Answer, or to otherwise respond to Plaintiff's Complaint in this matter, on the grounds
17 that good cause exists for such two week extension of time to respond.

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1 **PLEASE TAKE FURTHER NOTICE** that the content of this Joint Motion is
2 acceptable to all persons required to sign this document and it has been agreed by all parties
3 required to sign this document that his or her electronic signature can be affixed to this
4 document.

5 DATED: June 19, 2008

WALSH & FURCOLO, LLP

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7 By: s/ Regan Furcolo, Esq.
8 REGAN FURCOLO
9 Attorneys for Plaintiff American
Protection Insurance Company
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11 DATED: June 19, 2008

HILDING LAW FIRM

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